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January 4, 2024


BY EMAIL & ECF

The Honorable Ronnie Abrams
United States District Court Judge
Southern District of New York
40 Foley Square
New York, NY 10007

**Re: United States v. Habiba Fagge
21 Cr. 472 (RA)**

Application granted.

SO ORDERED.



Ronnie Abrams, U.S.D.J.
January 4, 2024

Dear Judge Abrams,

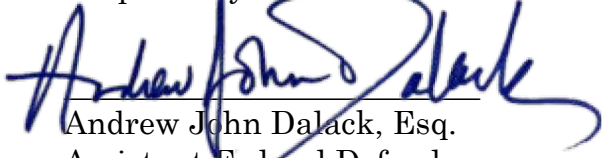
I write to request a one-time modification of Habiba Fagge's bail conditions to permit her to retain her United States passport until she returns to Dallas, Texas (where she resides) from Lanham, Maryland (where she is currently staying with her mother). Pre-Trial Services does not object to this modification.

As the Court is aware, Ms. Fagge had to return to the United States prematurely from her Court-approved trip to Nigeria because of her father's sudden passing. Unfortunately, due to issues at the airport with the United States Customs officials, who held Ms. Fagge for hours trying to confirm her approval to travel internationally, she missed her father's funeral service and burial.

Ms. Fagge is currently at home with her mother in Lanham, Maryland, and has been in touch with Pre-Trial Services regularly upon her return to the United States. Ms. Fagge has made arrangements to return to Dallas, Texas at the end of this month, but her U.S. Passport is her only form of identification on her person, as she unfortunately left her driver's license in Dallas before traveling to Nigeria. Consequently, she requires the Court's permission to retain her passport so that she may fly to Dallas at the end of the month, and Ms. Fagge will promptly surrender her passport when she arrives in Dallas. Pertinent to this application, Ms. Fagge remains in compliance with all bail conditions.

I thank the Court for its time and consideration of this application.

Respectfully Submitted,



Andrew John Dalack, Esq.
Assistant Federal Defender

Cc: AUSA Micah Fergenson
AUSA Matthew King
PTS Officer Dayshawn Bostic